

From: [Fugh, Justina](#)
To: [Keigwin, Richard](#); [Pease, Anita](#); [Messina, Edward](#); [Miles, James](#); [Teter, Royan](#)
Subject: Ethics advice concerning your invitation to the ELI annual awards dinner and fundraiser
Date: Tuesday, September 14, 2021 1:14:00 PM

Hi there,

OGC/Ethics understands that you have received or will soon receive an invitation from the Environmental Law Institute (ELI) to be its guest at its annual awards dinner to be held in person at and streamed virtually this year on October 19, 2021 from the Omni Shoreham Hotel in Washington, DC. I am writing to confirm that, if you decide to attend this event in person or virtually, you may do so consistent with the Standards of Ethical Conduct for Employees of the Executive Branch.

This event qualifies for the Widely-Attended-Gathering gift exception and the donor is not a federally registered lobbyist. Even if you are a political appointee, you may still accept this invitation if you wish. OGC/Ethics determines that your attendance at the event is in the Agency's interest because it will further agency programs and operations. Should you attend this event, you will NOT be required to report this as a gift on your financial disclosure report form because the gift is valued at \$210, which is BELOW the reporting threshold.

This approval applies only to invitations from ELI itself. Any invitations from other sources will require separate determinations by either OGC/Ethics or the appropriate Deputy Ethics Official. This determination covers you only -- the invitation is not transferable and is not intended for more than just one attendee.

Acceptance of Free Attendance to a Dinner and Fundraiser (WAG rule)

The gift offered is an evening reception and dinner sponsored by ELI. Because the organization is offering you a complimentary ticket, we must analyze it according to the gift rules. Generally, federal employees are prohibited from accepting gifts given because of their official position or given by a prohibited source (typically, a person either regulated by or seeking to do business with the EPA). In this instance, the gift of free attendance is offered to you because of your official position. In analyzing the situation, we determined that the WAG exception is available because the reception will be widely attended, there will be a diversity of views represented, and there is an opportunity for the exchange of ideas. In order to utilize this gift exception, OGC/Ethics must also make a written determination that we believe your attendance is in the Agency's interest. We do, in fact, conclude that there is an Agency interest in your attendance if you wish to attend.

Limitations Due to the Fundraiser Event

Please note that this event is a fundraiser. Therefore, ELI cannot use or reference your official

position or title or any authority associated with your public office in furtherance of the fundraising effort. You may not actively or visibly participate in the promotion, production, or presentation of the event, which means that you cannot sit at a head table nor stand in a receiving line. We have confirmed with ELI that you will be placed by ELI and not seated at the request of any sponsoring entity that has bought a table.

Please let me know if you have any questions.

Regards,

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

Message

From: Ross, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=38CAF91847DD4F95810C1F96D918871C-ROSS, MARGARET]
Sent: 2/5/2019 2:53:12 PM
To: Margaret Ross (Ross.Margaret@epa.gov) [Ross.Margaret@epa.gov]
BCC: Abboud, Michael [abboud.michael@epa.gov]; Allen, Reginald [Allen.Reginald@epa.gov]; Allnutt, David [Allnutt.David@epa.gov]; Amon, Dan [Amon.Dan@epa.gov]; Anastas, Nicholas [Anastas.Nicholas@epa.gov]; Ankley, Gerald [Ankley.Gerald@epa.gov]; Ashbee, Blake [ashbee.blake@epa.gov]; Avila, Aaron [avila.aaron@epa.gov]; Badalamente, Mark [Badalamente.Mark@epa.gov]; Bagley, Mark [Bagley.Mark@epa.gov]; Bahadori, Tina [Bahadori.Tina@epa.gov]; Banister, Beverly [Banister.Beverly@epa.gov]; Baptist, Erik [baptist.erik@epa.gov]; Barnett, Henry [Barnett.Henry@epa.gov]; Barone, Stan [Barone.Stan@epa.gov]; Barr, Pamela [Barr.Pamela@epa.gov]; Battaglia, Amy [Battaglia.Amy@epa.gov]; Battin, Andrew [Battin.Andrew@epa.gov]; Beach, Christopher [beach.christopher@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Behl, Betsy [Behl.Betsy@epa.gov]; Benevento, Douglas [benevento.douglas@epa.gov]; Benforado, Jay [Benforado.Jay@epa.gov]; Benjamin-Sirmons, Denise [Benjamin-Sirmons.Denise@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]; Benson, William [Benson.William@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Best-Wong, Benita [Best-Wong.Benita@epa.gov]; Binder, Bruce [Binder.Bruce@epa.gov]; Biro, Susan [Biro.Susan@epa.gov]; Blake, Wendy [Blake.Wendy@epa.gov]; Blancato, Jerry [Blancato.Jerry@epa.gov]; Blevins, John [Blevins.John@epa.gov]; Block, Molly [block.molly@epa.gov]; Bloom, David [Bloom.David@epa.gov]; Bohan, Suzanne [bohan.suzanne@epa.gov]; Bolen, Brittany [bolen.brittany@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]; Bonanno, Gale [Bonanno.Gale@epa.gov]; Brazauskas, Joseph [brazauskas.joseph@epa.gov]; Breen, Barry [Breen.Barry@epa.gov]; Brennan, Thomas [Brennan.Thomas@epa.gov]; Brincks, Mike [brincks.mike@epa.gov]; Briskin, Jeanne [Briskin.Jeanne@epa.gov]; Brooks, Karl [brooks.karl@epa.gov]; Brooks, Phillip [Brooks.Phillip@epa.gov]; Buckley, Timothy [Buckley.Timothy@epa.gov]; Buhl, Rick [Buhl.Rick@epa.gov]; Bunker, Byron [bunker.byron@epa.gov]; Burneson, Eric [Burneson.Eric@epa.gov]; Bussard, David [Bussard.David@epa.gov]; Campbell, Dave [campbell.dave@epa.gov]; Carpenter, Angela [Carpenter.Angela@epa.gov]; Carpenter, Wesley [Carpenter.Wesley@epa.gov]; Carter, Rick [Carter.Rick@epa.gov]; Cascio, Wayne [Cascio.Wayne@epa.gov]; Chancellor, Erin [chancellor.erin@epa.gov]; Charmley, William [charmley.william@epa.gov]; Chase, Felicia [chase.felicia@epa.gov]; Cheatham, Reggie [cheatham.reggie@epa.gov]; Cherry, Katrina [Cherry.Katrina@epa.gov]; Christensen, Kevin [Christensen.Kevin@epa.gov]; Chu, Ed [Chu.Ed@epa.gov]; Clark, Becki [Clark.Becki@epa.gov]; Coe, Mary [Coe.Mary@epa.gov]; Cogliano, Vincent [cogliano.vincent@epa.gov]; Coleman, Cheryl [Coleman.Cheryl@epa.gov]; Connors, Sandra [Connors.Sandra@epa.gov]; Conolly, Rory [Conolly.Rory@epa.gov]; Conway, Timothy [Conway.Tim@epa.gov]; Cook, Steven [cook.steven@epa.gov]; Coughlin, Christine [Coughlin.Christine@epa.gov]; Cozad, David [Cozad.David@epa.gov]; Cozzie, David [Cozzie.David@epa.gov]; Dalbey, Matthew [Dalbey.Matthew@epa.gov]; Darwin, Henry [darwin.henry@epa.gov]; Darwin, Veronica [darwin.veronica@epa.gov]; Davis, Patrick [davis.patrick@epa.gov]; Dawson, Jeffrey [Dawson.Jeff@epa.gov]; Dekleva, Lynn [dekleva.lynn@epa.gov]; DeLeon, Rafael [DeLeon.Rafael@epa.gov]; DeMarco, Frank [DeMarco.Frank@epa.gov]; Devlin, Betsy [Devlin.Betsy@epa.gov]; Diaz-Sanchez, David [Diaz-Sanchez.David@epa.gov]; Dierker, Carl [Dierker.Carl@epa.gov]; Dixon, Sean [dixon.sean@epa.gov]; Doa, Maria [Doa.Maria@epa.gov]; Dolph, Becky [Dolph.Becky@epa.gov]; Dombrowski, John [Dombrowski.John@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]; Donahue, Sean [donahue.sean@epa.gov]; Dorka, Lilian [Dorka.Lilian@epa.gov]; Doyle, Brett [doyle.brett@epa.gov]; Drake, Kerry [Drake.Kerry@epa.gov]; Dufour, Alfred [Dufour.Alfred@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Dunlap, David [dunlap.david@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]; Eby, Natasha [eby.natasha@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Edlund, Carl [edlund.carl@epa.gov]; Edwards, Jonathan [Edwards.Jonathan@epa.gov]; Eisenberg, Mindy [Eisenberg.Mindy@epa.gov]; Epley, Brian [epley.brian@epa.gov]; Epp, Timothy [Epp.Timothy@epa.gov]; Esher, Diana [Esher.Diana@epa.gov]; Etzel, Ruth [Etzel.Ruth@epa.gov]; Eubanks, Kristy [Eubanks.Kristy@epa.gov]; Falvo, Nicholas [falvo.nicholas@epa.gov]; Fays, Michael [fays.michael@epa.gov]; Fernandez, Cristina [Fernandez.Cristina@epa.gov]; Fields, Jenifer [fields.jenifer@epa.gov]; Filippelli, John [Filippelli.John@epa.gov]; Fine, Steven [fine.steven@epa.gov]; Fisher, Bill [Fisher.William@epa.gov]; Flowers, Lynn [Flowers.Lynn@epa.gov]; Fotouhi, David [fotouhi.david@epa.gov]; Frace, Sheila [Frace.Sheila@epa.gov]; Frithsen, Jeff [Frithsen.Jeff@epa.gov]; Frye, Tony (Robert) [frye.robert@epa.gov]; Fugh, Justina [Fugh.Justina@epa.gov]; Garcia, David [Garcia.David@epa.gov]; Garland, Jay [Garland.Jay@epa.gov]; Garvey, Megan [garvey.megan@epa.gov]; Geller, Andrew [Geller.Andrew@epa.gov]; George, Elizabeth [george.elizabeth@epa.gov]; Gervais, Gregory [Gervais.Gregory@epa.gov]; Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]; Gillespie, Andrew [Gillespie.Andrew@epa.gov]; Gilliland, Alice [Gilliland.Alice@epa.gov]; Goodin, John [Goodin.John@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov];

Gordon, Stephen [gordon.stephen@epa.gov]; Grantham, Nancy [Grantham.Nancy@epa.gov]; Gray, David [gray.david@epa.gov]; Gray, Linda [gray.linda@epa.gov]; Grifo, Francesca [Grifo.Francesca@epa.gov]; Grimm, Patrick [Grimm.Patrick@epa.gov]; Grundler, Christopher [grundler.christopher@epa.gov]; Guerrero, Carmen [guerrero.carmen@epa.gov]; Guilaran, Yu-Ting [Guilaran.Yu-Ting@epa.gov]; Guiseppi-Elie, Annette [Guiseppi-Elie.Annette@epa.gov]; Gullett, Brian [Gullett.Brian@epa.gov]; Gulliford, Jim [gulliford.jim@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Gunning, Paul [Gunning.Paul@epa.gov]; Gutierrez, Sally [Gutierrez.Sally@epa.gov]; Hadley, Angela [Hadley.Angela@epa.gov]; Haeuber, Richard [Haeuber.Richard@epa.gov]; Hage, Christopher [hage.christopher@epa.gov]; Hamlin, Tim [Hamlin.Tim@epa.gov]; Hanson, Paige (Catherine) [hanson.catherine@epa.gov]; Harlow, David [harlow.david@epa.gov]; Harnett, Bill [Harnett.Bill@epa.gov]; Harrison, Ben [Harrison.Ben@epa.gov]; Hartman, Mark [Hartman.Mark@epa.gov]; Harvey, Reid [Harvey.Reid@epa.gov]; Hauchman, Fred [hauchman.fred@epa.gov]; Haugen, David [haugen.david@epa.gov]; Heard, Anne [Heard.Anne@epa.gov]; Helm, Arron [Helm.Arron@epa.gov]; Henry, Tala [Henry.Tala@epa.gov]; Hestmark, Martin [Hestmark.Martin@epa.gov]; Hewitt, James [hewitt.james@epa.gov]; Hill, Franklin [Hill.Franklin@epa.gov]; Hill, Randy [Hill.Randy@epa.gov]; Hindin, David [Hindin.David@epa.gov]; Hines, Ronald [Hines.Ronald@epa.gov]; Hisel-McCoy, Sara [Hisel-McCoy.Sara@epa.gov]; Hitchens, Lynnann [hitchens.lynnann@epa.gov]; Hladick, Christopher [hladick.christopher@epa.gov]; Hoff, Dale [Hoff.Dale@epa.gov]; Holt, Kay [Holt.Kay@epa.gov]; Hoskinson, Carolyn [Hoskinson.Carolyn@epa.gov]; Humphreys, Hayly [humphreys.hayly@epa.gov]; Hyde, Tinka [hyde.tinka@epa.gov]; Idsal, Anne [idsal.anne@epa.gov]; Jackson, Ryan [jackson.ryan@epa.gov]; Jackson, Yvette [Jackson.Yvette@epa.gov]; Jennings, Robert [Jennings.Robert@epa.gov]; Johnson, Arthur [Johnson.Arthur@epa.gov]; Johnson, Barnes [Johnson.Barnes@epa.gov]; Johnson, James [Johnson.James@epa.gov]; Johnson, Kathleen [Johnson.Kathleen@epa.gov]; Jones, Lindsey [jones.lindsey@epa.gov]; Jones, Samantha [Jones.Samantha@epa.gov]; Jones-Peeler, Meshell [Jones-Peeler.Meshell@epa.gov]; Jordan, Deborah [Jordan.Deborah@epa.gov]; Judson, Richard [Judson.Richard@epa.gov]; Kadeli, Lek [Kadeli.Lek@epa.gov]; Kaplan, Robert [kaplan.robert@epa.gov]; Kasman, Mark [Kasman.Mark@epa.gov]; Kenny, Shannon [Kenny.Shannon@epa.gov]; Knudsen, Thomas [Knudsen.Thomas@epa.gov]; Konkus, John [konkus.john@epa.gov]; Kopec, Slawomir [kopec.slawomir@epa.gov]; Korleski, Christopher [korleski.christopher@epa.gov]; Kowalski, Edward [Kowalski.Edward@epa.gov]; Kunderinger, Kelly [kunderinger.kelly@epa.gov]; Lapierre, Kenneth [lapierre.kenneth@epa.gov]; LaPosta, Dore [LaPosta.Dore@epa.gov]; Lattimore, Craig [lattimore.craig@epa.gov]; Laureano, Javier [laureano.javier@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]; Lee, Charles [Lee.Charles@epa.gov]; Lee, Maja [lee.maja@epa.gov]; Leff, Karin [Leff.Karin@epa.gov]; Legare, Pamela [Legare.Pamela@epa.gov]; Leopard, Matthew (OEI) [Leopard.Matthew@epa.gov]; Letendre, Daisy [letendre.daisy@epa.gov]; Lindsay, Nancy [Lindsay.Nancy@epa.gov]; Lopez, Peter [lopez.peter@epa.gov]; Lovell, Will (William) [lovell.william@epa.gov]; Lowery, Brigid [Lowery.Brigid@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Lowrance, Richard [Lowrance.Richard@epa.gov]; Lueckenhoff, Dominique [Lueckenhoff.Dominique@epa.gov]; Lynch, Mary-Kay [Lynch.Mary-Kay@epa.gov]; Lyon, Christopher [lyon.christopher@epa.gov]; Lyons, Troy [lyons.troy@epa.gov]; Mackey, Cyndy [Mackey.Cyndy@epa.gov]; Maguire, Charles [maguire.charles@epa.gov]; Maher, Karen [Maher.Karen@epa.gov]; Manna, Richard [Manna.Richard@epa.gov]; Manzanilla, Enrique [Manzanilla.Enrique@epa.gov]; Mathur, Rohit [Mathur.Rohit@epa.gov]; Mazakas, Pam [Mazakas.Pam@epa.gov]; McDonald, James [McDonald.James@epa.gov]; McDonough, Owen [mcdonough.owen@epa.gov]; McGartland, Al [McGartland.Al@epa.gov]; McIlwain, Serena [McIlwain.Serena@epa.gov]; McKinney, Robert [mckinney.robert@epa.gov]; McClain, Jennifer [McClain.Jennifer@epa.gov]; McManus, Catharine [mcmanus.catharine@epa.gov]; McNally, Robert [Mcnally.Robert@epa.gov]; Melvin, Karen [Melvin.Karen@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Michaud, John [Michaud.John@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Miller, Amy [Miller.Amy@epa.gov]; Molina, Michael [molina.michael@epa.gov]; Moraff, Kenneth [Moraff.Ken@epa.gov]; Morgan, Ashley [morgan.ashley@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Moser, Rebecca [Moser.Rebecca@EPA.GOV]; Mottley, Tanya [Mottley.Tanya@epa.gov]; Mugdan, Walter [Mugdan.Walter@epa.gov]; Munns, Wayne [Munns.Wayne@epa.gov]; Munoz, Charles [munoz.charles@epa.gov]; Myrick, Pamela [Myrick.Pamela@epa.gov]; Nagle, Deborah [Nagle.Deborah@epa.gov]; Nam, Ed [nam.ed@epa.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Newton, Cheryl [Newton.Cheryl@epa.gov]; Nguyen, DucH [Nguyen.DucH@epa.gov]; Nickerson, William [Nickerson.William@epa.gov]; Nishida, Jane [Nishida.Jane@epa.gov]; Noga, Vaughn [Noga.Vaughn@EPA.GOV]; Noonan, Jenny [Noonan.Jenny@epa.gov]; Nussbaumer, James [nussbaumer.james@epa.gov]; OBrien, Kathy [Obrien.Kathy@epa.gov]; O'Connor, Darcy [oconnor.darcy@epa.gov]; Ohanian, Edward [Ohanian.Edward@epa.gov]; Opalski, Dan [Opalski.Dan@epa.gov]; Orme-Zavaleta, Jennifer [Orme-Zavaleta.Jennifer@epa.gov]; Packard, Elise [Packard.Elise@epa.gov]; Palich, Christian [palich.christian@epa.gov]; Palmer, Leif [Palmer.Leif@epa.gov]; Patlewicz, Grace [Patlewicz.Grace@epa.gov]; Patrick, Kimberly [Patrick.Kimberly@epa.gov]; Payne, James [payne.james@epa.gov]; Peabody, Hitch [Peabody.Hitch@epa.gov]; Petrole, Maryann [Petrole.Maryann@epa.gov];

Pirzadeh, Michelle [Pirzadeh.Michelle@epa.gov]; Polk, Denise [Polk.Denise@epa.gov]; Pollins, Mark [Pollins.Mark@epa.gov]; Price, PaulS [Price.PaulS@epa.gov]; Prince, John [Prince.John@epa.gov]; Quast, Sylvia [Quast.Sylvia@epa.gov]; Radzikowski, Mary Ellen [Radzikowski.Maryellen@epa.gov]; Reeder, John [Reeder.John@epa.gov]; Regli, Stig [Regli.Stig@epa.gov]; Richardson, RobinH [Richardson.RobinH@epa.gov]; Ringel, Aaron [ringel.aaron@epa.gov]; Robbins, Chris [Robbins.Chris@epa.gov]; Robertson, Lakeshia [robertson.lakeshia@epa.gov]; Robichaud, Jeffery [Robichaud.Jeffery@epa.gov]; Rodrick, Christian [rodrick.christian@epa.gov]; Rodrigues, Cecil [rodrigues.cecil@epa.gov]; Rogers, John M. [Rogers.John@epa.gov]; Ross, Mary [Ross.Mary@epa.gov]; Rowson, David [Rowson.David@epa.gov]; Salyer, Kathleen [Salyer.Kathleen@epa.gov]; Sanders, Amy [Sanders.Amy@epa.gov]; Sasser, Erika [Sasser.Erika@epa.gov]; Sasseville, Sonya [Sasseville.Sonya@epa.gov]; Sawyers, Andrew [Sawyers.Andrew@epa.gov]; Sayles, Gregory [Sayles.Gregory@epa.gov]; Schaaf, Eric [Schaaf.Eric@epa.gov]; Schefski, Kenneth [Schefski.Kenneth@epa.gov]; Scheraga, Joel [Scheraga.Joel@epa.gov]; Schmidt, Lorie [Schmidt.Lorie@epa.gov]; Schumacher, Brian [Schumacher.Brian@epa.gov]; Schwab, Justin [schwab.justin@epa.gov]; Scott, Jeff [Scott.Jeff@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Segall, Martha [Segall.Martha@epa.gov]; Servidio, Cosmo [servidio.cosmo@epa.gov]; Shah, Imran [Shah.Imran@epa.gov]; Shaw, Betsy [Shaw.Betsy@epa.gov]; Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Silzer, Stefan [Silzer.Stefan@epa.gov]; Simon, Harvey [Simon.Harvey@epa.gov]; Simon, Karl [Simon.Karl@epa.gov]; Simon, Nigel [Simon.Nigel@epa.gov]; Simons, Vicki [Simons.Vicki@epa.gov]; Singh, Amar V. [singh.amar@epa.gov]; Slimak, Michael [Slimak.Michael@epa.gov]; Smidinger, Betsy [Smidinger.Betsy@epa.gov]; Smith, Mark A. [Smith.Marka@epa.gov]; Smith, Walker [Smith.Walker@epa.gov]; Snyder, Carolyn [Snyder.Carolyn@epa.gov]; Snyder, Emily [Snyder.Emily@epa.gov]; Sonich-Mullin, Cynthia [Sonich-Mullin.Cynthia@epa.gov]; Srinivasan, Gautam [Srinivasan.Gautam@epa.gov]; Stalcup, Dana [Stalcup.Dana@epa.gov]; Stanek, Lindsay [Stanek.Lindsay@epa.gov]; Stanich, Ted [Stanich.Ted@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Stavnes, Sandra [Stavnes.Sandra@epa.gov]; Steenbock, John [Steenbock.John@epa.gov]; Stein, Kathie [Stein.Kathie@epa.gov]; Stein, Raffael [Stein.Raffael@epa.gov]; Stepp, Cathy [stepp.cathy@epa.gov]; Stern, Allyn [Stern.Alyn@epa.gov]; Stoker, Michael B. [stoker.michael@epa.gov]; Strauss, Alexis [Strauss.Alexis@epa.gov]; Sugiyama, George [sugiyama.george@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Symmes, Brian [Symmes.Brian@epa.gov]; Tapia, Cecilia [Tapia.Cecilia@epa.gov]; Taylor, Jessica [taylor.jessica@epa.gov]; Teichman, Kevin [Teichman.Kevin@epa.gov]; Tejada, Matthew [Tejada.Matthew@epa.gov]; Terris, Carol [Terris.Carol@epa.gov]; Thayer, Kris [thayer.kris@epa.gov]; Thomas, Deb [thomas.debrah@epa.gov]; Thomas, Russell [Thomas.Russell@epa.gov]; Thompkins, Anita [Thompkins.Anita@epa.gov]; Thompson, Fred [Thompson.Fred@epa.gov]; Torres, Tomas [Torres.Tomas@epa.gov]; Tran, Victoria [tran.victoria@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Vandenberg, John [Vandenberg.John@epa.gov]; vanDrunick, Suzanne [vanDrunick.Suzanne@epa.gov]; Veal, Lee [Veal.Lee@epa.gov]; Vendinello, Lynn [Vendinello.Lynn@epa.gov]; Vizian, Donna [Vizian.Donna@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Walker, Mary [walker.mary@epa.gov]; Wall, Tom [Wall.Tom@epa.gov]; Walsh, Ed [Walsh.Ed@epa.gov]; Ward, Mary-Beth [Ward.Mary-Beth@epa.gov]; Watkins, Tim [Watkins.Tim@epa.gov]; Wayland, Richard [Wayland.Richard@epa.gov]; Weber, Rebecca [Weber.Rebecca@epa.gov]; Weiss, Steven [Weiss.Steven@epa.gov]; Wells, Jeffrey [Wells.jeffrey@epa.gov]; White, Elizabeth [white.elizabeth@epa.gov]; Whung, Pai-Yei [Whung.Pai-Yei@epa.gov]; Widawsky, David [Widawsky.David@epa.gov]; Wilcox, Jahan [wilcox.jahan@epa.gov]; Wildeman, Anna [wildeman.anna@epa.gov]; Williams, Antony [Williams.Antony@epa.gov]; Williamson, Anahita [Williamson.Anahita@epa.gov]; Wood, Robert [Wood.Robert@epa.gov]; Wooden-Aguilar, Helena [Wooden-Aguilar.Helena@epa.gov]; Woods, Clint [woods.Clint@epa.gov]; Woolford, James [Woolford.James@epa.gov]; Young, Brenda [young.brenda@epa.gov]; Zartarian, Valerie [Zartarian.Valerie@epa.gov]; Zepp, Richard [Zepp.Richard@epa.gov]; Zimmer, Nathaniel [zimmer.nathaniel@epa.gov]; Wood, Anna [Wood.Anna@epa.gov]

Subject: Public Financial Disclosure Reports due May 15, 2019

Greetings Public Filers,

Last week, you received an annual financial disclosure report assignment from INTEGRITY.gov. This report covers calendar year 2018. The deadline for annual reports is 5/15/19. If you believe that you have received this assignment in error, or if you need assistance with your report, please contact Margaret Ross at Ross.margaret@epa.gov.

Thanks,
Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221 |work cell 202-527-0432

Message

From: Ross, Margaret [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=38CAF91847DD4F95810C1F96D918871C-ROSS, MARGARET]
Sent: 10/13/2017 7:59:11 PM
To: Messina, Edward [Messina.Edward@epa.gov]
Subject: RE: Question about your financial disclosure report

Hi Ed, I've just returned your report to you to look over. When you're done checking it out, just resubmit it and I'll get it.

I've gone ahead and deleted the line in the transaction section regarding the [Ex. 6 Personal Privacy (PP)] is for more than \$10k, then go ahead and list it with the other items in the liability section. If it's already there, great!

Also, I noticed [Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

[Ex. 6 Personal Privacy (PP)]

feel free to delete. If not, go ahead and leave it.

Thank you for your attention to this!

Best,
Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: Messina, Edward
Sent: Friday, October 13, 2017 3:07 PM
To: Ross, Margaret <Ross.Margaret@epa.gov>
Subject: RE: Question about your financial disclosure report

Thanks. I [Ex. 6 Personal Privacy (PP)] Do you have what I submitted so I can take a look.

Ed Messina
Director
Monitoring, Assistance, and Media Programs Division
U.S. EPA
1200 Pennsylvania Ave., N.W. (MC-2227A)
Washington, DC 20460
p: (202) 564-1191
f: (202) 564-0050

From: Ross, Margaret
Sent: Wednesday, October 11, 2017 12:45 PM
To: Messina, Edward <Messina.Edward@epa.gov>
Subject: Question about your financial disclosure report

Hi Edward,

I have a quick question about your financial disclosure report. You report the [Ex. 6 Personal Privacy (PP)] but you don't need to. I'm happy to delete that for you. What you would need to report would be a loan associated with the purchase. Did

you get: **Ex. 6 Personal Privacy (PP)** ? If you did, and it's a loan that's already reported in the liability section, then you're good to go. If you got a loan, but it's not reported, then we'll need to add it. If you didn't get a loan, I'll delete the transaction and you're good to go.

Let me know what needs to happen and we can get it taken care of. Give me a call or reply to this email at your earliest convenience.

Best,
Margaret

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: [Messina, Edward](#)
To: [Griffo, Shannon](#)
Subject: RE: Follow-up from OGC/Ethics - your recent 278
Date: Sunday, June 26, 2022 7:30:51 PM

Done. (b) (6) added to Section 7 representing sales and purchases. These were done by her account manager so she did not know the dates and had to pull up some more detailed statements. Should be good now.

Ed Messina, Esq.
Director, Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Wednesday, June 22, 2022 12:17 PM
To: Messina, Edward <Messina.Edward@epa.gov>
Subject: RE: Follow-up from OGC/Ethics - your recent 278
Sounds good. Thanks for the update.
Shannon Griffo
Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Wednesday, June 22, 2022 12:16 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Follow-up from OGC/Ethics - your recent 278
Getting there. I'm still getting more details.
Ed

Ed Messina, Esq.
Director, Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.

From: Griffo, Shannon <Griffo.Shannon@epa.gov>
Sent: Wednesday, June 22, 2022 12:14 PM
To: Messina, Edward <Messina.Edward@epa.gov>
Subject: RE: Follow-up from OGC/Ethics - your recent 278

Hi Ed,
Circling back on this email exchange – have you had a chance to take a look? Let me know your thoughts when you can so I can get your report certified.
Thanks!
Shannon
Shannon Griffo

Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Griffo, Shannon

Sent: Friday, June 10, 2022 9:57 AM

To: Messina, Edward <Messina.Edward@epa.gov>

Subject: RE: Follow-up from OGC/Ethics - your recent 278

Hi Ed,

Thanks for looking into this! So technically in Part 7 of the Annual Report you need to include any transactions within a (b) (6) And moving funds from one option to another option entails a sale of the first investment and purchase of the second – not an exchange. For those transactions that occurred in 2020, there's nothing we can do to last year's Annual Report (filed in 2021) since it's already certified. If the fund is still on this year's report, we can add an endnote saying "inadvertent oversight that the sale of this fund was not previously reported." But that doesn't seem to be the case since you just have the (b) (6) now.

If you can't figure out when (b) (6)

(b) (6) I'm willing to just note this here as a technical error (since there's no conflicts). One option is to add an endnote to the (b) (6) saying "Inadvertent oversight that the purchase of this fund was not previously reported." Then moving forward, just know that you'll have to report transactions of such (b) (6) on next year's annual report.

Just let me know if you are good with that approach. If so, feel free to add the endnotes then hit submit so it comes back to me. Or just send it back to me and I'll add them for you.

Thanks again!

Shannon

Shannon Griffo

Office of General Counsel, Ethics Office
U.S. Environmental Protection Agency
(202) 564-7061

From: Messina, Edward <Messina.Edward@epa.gov>

Sent: Thursday, June 9, 2022 3:08 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: RE: Follow-up from OGC/Ethics - your recent 278

So I checked with (b) (6)

(b) (6)
(b) (6)
(b) (6). Here is the information, I have been able to glean from the statements. Let me know your thoughts.

(b) (6)

(b) (6)
(b) (6)
(b) (6)

Ed

Ed Messina, Esq.
Director, Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Thursday, June 9, 2022 1:10 PM

To: Messina, Edward <Messina.Edward@epa.gov>

Subject: RE: Follow-up from OGC/Ethics - your recent 278

Just got notice the authentication service to Integrity was restored. Hopefully it works for you!

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: Messina, Edward <Messina.Edward@epa.gov>

Sent: Thursday, June 9, 2022 12:33 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: RE: Follow-up from OGC/Ethics - your recent 278

OK. Thanks.

Ed Messina, Esq.
Director, Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Thursday, June 9, 2022 12:27 PM

To: Messina, Edward <Messina.Edward@epa.gov>

Subject: RE: Follow-up from OGC/Ethics - your recent 278

I actually just got an email from OGE saying that they are aware of an issue with MAX authentication that is prohibiting users from logging into Integrity. And Integrity staff are actively working with MAX.gov for a solution. So sounds like it's a problem for a lot of folks. Hopefully it's fixed soon.

Good timing on this email because it was on my list today to remind you about this, so thanks for the update!

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: Messina, Edward <Messina.Edward@epa.gov>

Sent: Thursday, June 9, 2022 12:23 PM

To: Griffo, Shannon <Griffo.Shannon@epa.gov>

Subject: RE: Follow-up from OGC/Ethics - your recent 278

Just fyi that I am having trouble getting into Max.gov. PIV card and user id and password are not working. I sent an e-mail to their support.

Ed

Ed Messina, Esq.

Director, Office of Pesticide Programs

Office of Chemical Safety & Pollution Prevention

U.S. Environmental Protection Agency

Washington, D.C.

From: Griffo, Shannon <Griffo.Shannon@epa.gov>

Sent: Wednesday, May 25, 2022 11:03 AM

To: Messina, Edward <Messina.Edward@epa.gov>

Subject: Follow-up from OGC/Ethics - your recent 278

Hi Ed,

I'm reviewing your Annual Report and wanted to see if you had any reportable transactions that should have been included in Part 7 (Transactions). Remember that you should include all purchases, sales or exchanges of securities (e.g., stocks, mutual funds etc.) that occurred during the reporting period (CY2021) if the amount of the transaction was more than \$1,000. In Part 5, I noticed that [REDACTED]

[REDACTED]. If any of those were sales or purchases over \$1,000, then they'll need to be added to Part 7. I'm going to go ahead and send the report back to you in INTEGRITY to add any necessary transactions. Just remember to hit submit when you are done so that the report comes back to me for review/certification.

Thanks!

Shannon

Shannon Griffo

Office of General Counsel, Ethics Office

U.S. Environmental Protection Agency

(202) 564-7061

From: [Messina, Edward](#)
To: [Fugh, Justina](#)
Subject: RE: REMINDER: Your public financial disclosure report is due 5/15/20!
Date: Tuesday, May 12, 2020 3:04:55 PM
Attachments: [REMINDER Your public financial disclosure report is due 5/15/20!.msg](#)

I just completed and got the green "submitted" sign at the end.
Hope you are well,
Ed

Ed Messina, Esq.
Deputy Office Director (Programs)
Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: [Messina, Edward](#)
To: [Fugh, Justina](#)
Subject: RE: REMINDER: your public financial disclosure report is due Monday, May 17 (yes, this month)
Date: Monday, May 17, 2021 10:53:04 AM

I signed and filed. Thanks.

Ed Messina, Esq.
Acting Office Director
Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Thursday, May 6, 2021 12:04 PM
Cc: Badalamente, Mark <Badalamente.Mark@epa.gov>; Best-Wong, Benita <Best-Wong.Benita@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Behl, Betsy <Behl.Betsy@epa.gov>; Benjamin-Sirmons, Denise <Benjamin-Sirmons.Denise@epa.gov>; Barr, Pamela <Barr.Pamela@epa.gov>; Battin, Andrew <Battin.Andrew@epa.gov>; Benforado, Jay <Benforado.Jay@epa.gov>; Blancato, Jerry <Blancato.Jerry@epa.gov>; Brincks, Mike <brincks.mike@epa.gov>; Breen, Barry <Breen.Barry@epa.gov>; Bunker, Byron <bunker.byron@epa.gov>; Buhl, Rick <Buhl.Rick@epa.gov>; Cole, Joseph E. <cole.josephe@epa.gov>; Chu, Ed <Chu.Ed@epa.gov>; Cozad, David <Cozad.David@epa.gov>; DeLeon, Rafael <DeLeon.Rafael@epa.gov>; Clark, Becki <Clark.Beki@epa.gov>; Clanton, Michael <Clanton.Michael@epa.gov>; Dierker, Carl <Dierker.Carl@epa.gov>; Diaz-Sanchez, David <Diaz-Sanchez.David@epa.gov>; Doa, Maria <Doa.Maria@epa.gov>; Dombrowski, John <Dombrowski.John@epa.gov>; Dorka, Lilian <Dorka.Lilian@epa.gov>; Dufour, Alfred <Dufour.Alfred@epa.gov>; Drake, Kerry <Drake.Kerry@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Epp, Timothy <Epp.Timothy@epa.gov>; Evangelista, Pat <Evangelista.Pat@epa.gov>; Frazer, Brian <Frazer.Brian@epa.gov>; Garland, Jay <Garland.Jay@epa.gov>; Gillespie, Andrew <Gillespie.Andrew@epa.gov>; Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>; Gilliland, Alice <Gilliland.Alice@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Grifo, Francesca <Grifo.Francesca@epa.gov>; Guerrero, Carmen <guerrero.carmen@epa.gov>; Grundler, Christopher <grundler.christopher@epa.gov>; Guiseppi-Elie, Annette <Guiseppi-Elie.Annette@epa.gov>; Gutierrez, Sally <Gutierrez.Sally@epa.gov>; Hamlin, Tim <Hamlin.Tim@epa.gov>; Hart, Debbi <Hart.Debbi@epa.gov>; Helm, Arron <Helm.Arron@epa.gov>; Hisel-McCoy, Sara <Hisel-McCoy.Sara@epa.gov>; Hitchens, Lynnann <hitchens.lynnann@epa.gov>; Hoskinson, Carolyn <Hoskinson.Carolyn@epa.gov>; Hubbell, Bryan <Hubbell.Bryan@epa.gov>; Humphrey, Leslie <Humphrey.Leslie@epa.gov>; Jackson, Yvette <Jackson.Yvette@epa.gov>; Johnson, Kathleen <Johnson.Kathleen@epa.gov>; Jordan, Deborah <Jordan.Deborah@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>; Kadeli, Lek <Kadeli.Lek@epa.gov>; Kasman, Mark <Kasman.Mark@epa.gov>; Keeley, Ann <Keeley.Ann@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Kenny, Shannon <Kenny.Shannon@epa.gov>; Knudsen, Thomas <Knudsen.Thomas@epa.gov>; Koslow, Karin <Koslow.Karin@epa.gov>; LaPosta, Dore <LaPosta.Dore@epa.gov>; Legare, Pamela

<Legare.Pamela@epa.gov>; Mackey, Cyndy <Mackey.Cyndy@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>; Lowery, Brigid <Lowery.Brigid@epa.gov>; May, Benjamin <May.Benjamin@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>; McLain, Jennifer L. <McLain.Jennifer@epa.gov>; McManus, Catharine <mcmanus.catharine@epa.gov>; Melvin, Karen <Melvin.Karen@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>; Neugeboren, Steven <Neugeboren.Steven@epa.gov>; Nagle, Deborah <Nagle.Deborah@epa.gov>; Nam, Ed <nam.ed@epa.gov>; Myrick, Pamela <Myrick.Pamela@epa.gov>; Mosby, Jackie <Mosby.Jackie@epa.gov>; Nguyen, DucH <Nguyen.DucH@epa.gov>; Nickerson, William <Nickerson.William@epa.gov>; Noga, Vaughn <Noga.Vaughn@EPA.GOV>; Packard, Elise <Packard.Elise@epa.gov>; Patrick, Kimberly <Patrick.Kimberly@epa.gov>; Osinski, Michael <Osinski.Michael@epa.gov>; Pirzadeh, Michelle <Pirzadeh.Michelle@epa.gov>; Robichaud, Jeffery <Robichaud.Jeffery@epa.gov>; Richardson, RobinH <Richardson.RobinH@epa.gov>; Robbins, Chris <Robbins.Chris@epa.gov>; Rowson, David <Rowson.David@epa.gov>; Sawyers, Andrew <Sawyers.Andrew@epa.gov>; Sams, Reeder <Sams.Reeder@epa.gov>; Sasser, Erika <Sasser.Erika@epa.gov>; Ruvo, Richard <Ruvo.Richard@epa.gov>; Scheraga, Joel <Scheraga.Joel@epa.gov>; Schaaf, Eric <Schaaf.Eric@epa.gov>; Sayles, Gregory <Sayles.Gregory@epa.gov>; Schefski, Kenneth <Schefski.Kenneth@epa.gov>; Scott, Jeff <Scott.Jeff@epa.gov>; Seager, Cheryl <Seager.Cheryl@epa.gov>; Shah, Imran <Shah.Imran@epa.gov>; Simon, Karl <Simon.Karl@epa.gov>; Simon, Nigel <Simon.Nigel@epa.gov>; Singh, Amar V. <singh.amar@epa.gov>; Singletary, DeAndre <Singletary.DeAndre@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Stanich, Ted <Stanich.Ted@epa.gov>; Tapia, Cecilia <Tapia.Cecilia@epa.gov>; Thomas, Russell <Thomas.Russell@epa.gov>; Thompkins, Anita <Thompkins.Anita@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Trimble, Katherine <Trimble.Katherine@epa.gov>; VanDrunick, Suzanne <vanDrunick.Suzanne@epa.gov>; Updike, David <Updike.David@epa.gov>; Viswanathan, Krishna <Viswanathan.Krishna@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Wall, Tom <Wall.Tom@epa.gov>; Walsh, Ed <Walsh.Ed@epa.gov>; Watkins, Tim <Watkins.Tim@epa.gov>; Widawsky, David <Widawsky.David@epa.gov>; Williams, Antony <Williams.Antony@epa.gov>; Williamson, Anahita <Williamson.Anahita@epa.gov>; Wood, Anna <Wood.Anna@epa.gov>; Wooden-Aguilar, Helena <Wooden-Aguilar.Helena@epa.gov>; Wyatt, Marc <Wyatt.Joe@epa.gov>; Zartarian, Valerie <Zartarian.Valerie@epa.gov>; Payne, James (Jim) <payne.james@epa.gov>; Campbell, Jennie <Campbell.Jennie@epa.gov>; Canavan, Sheila <Canavan.Sheila@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>; Eubanks, Kristy <Eubanks.Kristy@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Segall, Martha <Segall.Martha@epa.gov>; Symmes, Brian <Symmes.Brian@epa.gov>; wilson.eric@epa.gov

Subject: REMINDER: your public financial disclosure report is due Monday, May 17 (yes, this month)
Hi there,

You can't avoid the inevitable: it's time to file your public financial disclosure report. **Your 278 is due May 17, 2021** and, as of today, you have not yet started your report in [Integrity](#). You are required to file this report so contact me if you don't understand why you receiving this message.

Even though we're working remotely and balancing home and work life as best we can, this financial disclosure reporting obligation remains the same. The U.S. Office of Government Ethics cannot alter the due date because it's set by statute. However, you may request an individual extension of your due date. We may grant you an extension of the due date up to 45 days or, for extraordinary circumstances (e.g., extended sick leave), up to 90 days. To request a deadline, write to us prior to May 17 and provide a specific reason and tell us whether you need 45 or 90 days. **To request an extension, please send an email to ethics@epa.gov.** You will get an email response from us with our

determination.

WHAT HAPPENS IF YOU MISS THE DEADLINE

We will assess a \$200 late filing fee. We remind filers (see attached pdf) that you must respect the filing deadlines and provide an accurate report.

- **Late fee: a \$200 late filing fee is imposed by law for any financial disclosure report filed more than 30 days after the due date.** A waiver of the late fee will be granted only for extraordinary circumstances. If you need more time, request an extension from ethics@epa.gov before the deadline.

DON'T FORGET TO REPORT TRANSACTIONS

- For your annual report, you can upload your periodic transaction reports (OGE 278Ts) that you filed during the year. Also remember to report the purchases, sales or exchanges of any excepted investment funds (over \$1000 per transaction). You can refresh your recollection about transactions filings by reviewing the attached word document.
- Periodic transaction reports (OGE 278-T) – Remember, you must file an OGE 278-T in *Integrity* to report the purchase, sale, or exchange of stocks, bonds, and other securities over \$1,000 *the earlier of* 30 days of learning of a transaction but no more than 45 days of the transaction taking place. There is an automatic \$200 fine or any missed transaction filing.

DO YOUR BEST TO REPORT ALL NECESSARY INFORMATION

- Submit a complete and accurate report: When you submit your report, you are certifying that the report is complete and accurate, so make sure that you provide all of the required information. Look, we know this report can be confusing, so contact us before you file if you have questions. Don't just ignore the obligation or the deadline!
- Do not include Personally Identifiable Information (PII): To protect your privacy, we recommend that you do not disclose personally identifiable information such as account numbers, names of your spouse or children, names of your domestic financial institutions, or other PII. We will do our best to redact this information if you inadvertently disclose it on your report, but the best practice is for you to omit disclosing this information.

GET BACK TO US WITHIN 14 DAYS

- Respond timely to our follow-up questions: If someone from OGC/Ethics contacts you for additional information, you must respond within 14 days of the request or show good cause for your delay. If you willfully fail to file a report or fail to provide the necessary information, then please know that there are consequences. You may be referred to the U.S. Attorney General for civil prosecution. I know it seems harsh, but you have a serious responsibility here, and we have a duty to enforce this obligation. Once, I had to refer a former EPA person who, after multiple reminders and entreaties, failed to file her termination 278. In the end, she submitted her form and also paid a civil penalty of \$15,000.

REMINDER ABOUT WHAT "PUBLIC" DISCLOSURE MEANS

Your report is available to the public upon request: We are required by law to release any OGE 278e or 278-T after 30 days of filing upon the written request by a member of the public. We do not need your prior permission, though we will send you a courtesy email (unless the requestor is a federal investigator). That said, we rarely receive any requests for the forms of career employees.

Please contact me or ethics@epa.gov if you have questions. Your OGC/Ethics friends are standing by to help as always!

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
Subject: REMINDER: Your public financial disclosure report is due 5/15/20!
Date: Tuesday, April 14, 2020 10:17:00 AM
Attachments: [Advisory to all 278 filers about filing fee.pdf](#)
[When to Report Transactions on the OGE 278 and Part 7 - May 2019.docx](#)

Hi there,

Well, you may try to hide by not coming into the office anymore but you can't avoid the inevitable: it's time to file your public financial disclosure report. **Your 278 is due May 15, 2020** and, as of today, you have not yet submitted your report in [Integrity](#). You are required to file this report so contact me if you don't understand why you receiving this message.

Even though we're working remotely and balancing home and work life as best we can, this financial disclosure reporting obligation remains the same. The U.S. Office of Government Ethics cannot alter the May 15 due date because it's set by statute. However, you may request an individual extension of your due date. We may grant you an extension of the due date up to 45 days or, for extraordinary circumstances (e.g., extended sick leave), up to 90 days. To request a deadline, write to us prior to May 15 and provide a specific reason (just saying "COVID 19" is not a specific enough; we need to know why YOU can't make the deadline), and tell us whether you need 45 or 90 days. **To request an extension, please send an email to ethics@epa.gov.** You will get an email response from us with our determination.

WHAT HAPPENS IF YOU MISS THE DEADLINE

We will assess a \$200 late filing fee. We reminded all filers last year (see attached pdf) that you must respect the filing deadlines and provide an accurate report.

- **Late fee: a \$200 late filing fee is imposed by law for any financial disclosure report filed more than 30 days after the due date.** A waiver of the late fee will be granted only for extraordinary circumstances. If you need more time, request an extension from ethics@epa.gov before the deadline.

DON'T FORGET TO REPORT TRANSACTIONS

- For your annual report, you can upload your periodic transaction reports (OGE 278Ts) that you filed during the year. Also remember to report the purchases, sales or exchanges of any excepted investment funds (over \$1000 per transaction). You can refresh your recollection about transactions filings by reviewing the attached word document.
- **Periodic transaction reports** (OGE 278-T) – Remember, you must file an OGE 278-T in *Integrity* to report the purchase, sale, or exchange of stocks, bonds, and other securities over \$1,000 *the earlier of* 30 days of learning of a transaction but no more than 45 days of the transaction taking place. Again, we can fine you \$200 for any missed transaction filing.

DO YOUR BEST TO REPORT ALL NECESSARY INFORMATION

- **Submit a complete and accurate report:** When you submit your report, you are certifying that the report is complete and accurate, so make sure that you provide all of the required information. Look, we know this report can be confusing, so contact us before you file if you have questions. Don't just ignore the obligation or the deadline!
- **Do not include Personally Identifiable Information (PII):** To protect your privacy, we recommend that you do not disclose personally identifiable information such as account numbers, names of your spouse or children, names of your domestic financial institutions, or other PII. We will do our best to redact this information if you inadvertently disclose it on your report, but the best practice is for you to omit disclosing this information.

GET BACK TO US WITHIN 14 DAYS

- **Respond timely to our follow-up questions:** If someone from OGC/Ethics contacts you for additional information, you must respond within 14 days of the request or show good cause for your delay. If you willfully fail to file a report or fail to provide the necessary information, then please know that there are consequences. You may be referred to the U.S. Attorney General for civil prosecution. I know it seems harsh, but you have a serious

responsibility here, and we have a duty to enforce this obligation. Once, I had to refer a former EPA person who, after multiple reminders and entreaties, failed to file her termination 278. In the end, she submitted her form and also paid a civil penalty of \$15,000.

REMINDER ABOUT WHAT “PUBLIC” DISCLOSURE MEANS

- Your report is available to the public upon request: We are required by law to release any OGE 278e or 278-T after 30 days of filing upon the written request by a member of the public. We do not need your prior permission, though we will send you a courtesy email (unless the requestor is a federal investigator). Just so you know, OGC/Ethics is currently processing several requests from media outlets and other organizations to inspect the public reports of Agency filers.

Please contact me or ethics@epa.gov if you have questions. Your OGC/Ethics friends are standing by to help as always!

Stay safe and stay strong!
Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
GENERAL COUNSEL

MEMORANDUM

SUBJECT: Timely Filing of Public Financial Disclosure and Periodic Transaction Reports

FROM: David Cozad *David Cozad* 8/29/19
Acting Designated Agency Ethics Official

TO: All EPA Public Financial Disclosure Report Filers

In 1978, Congress enacted the Ethics In Government Act, 5 U.S.C. app., to establish the Executive Branch financial disclosure reporting system that requires mandatory public disclosure of financial and employment information of certain officials and their immediate families. Because you occupy a designated position (either permanently or for more than 60 days on detail), you are required by this statute to file the public financial disclosure report. As executive branch employees, we are all bound by federal ethics laws and regulations, including prohibitions against financial conflicts of interest and loss of impartiality. Your disclosures allow the Office of General Counsel's Ethics Office (OGC/Ethics) to assist you in identifying and addressing potential or actual conflicts of interest in order to maintain the integrity of the Agency's programs and operations.

This memorandum formally reminds you that you are required by law to timely and accurately file your Public Financial Disclosure Reports (OGE 278e)¹ and Periodic Transaction Reports (OGE 278-Ts).² Failure to file timely will result in a **\$200 late filing fee** unless you formally request and receive a waiver of the late fee from the Designated Agency Ethics Official (DAEO) or Alternate Designated Agency Ethics Official (ADAEO).³ Unpaid late fees are subject to the Agency's⁴ and the government's debt collection procedures.

In addition to filing timely, you must also file a complete and accurate report. Should OGC/Ethics contact you for any additional required information, you will have no more than **30 days** to update your report. For guidance on how to file an accurate report, please refer to the Public Financial Disclosure Guide or contact OGC/Ethics at ethics@epa.gov.

¹ See 5 U.S.C. app. § 101; 5 C.F.R. § 2634.201.

² Pub. L. 112-105 § 11 (STOCK Act).

³ See 5 U.S.C. app. § 104(d)(1); 5 C.F.R. § 2634.704(a).

⁴ See Resource Management Directive System 2540-03-P2 dated 07/12/2016.

Please refer to this chart for your filing obligations:

OGE 278e - New Entrant reports	Within 30 days of entering a covered position (either by appointment to a permanent or acting in covered position)
OGE 278e – Incumbent reports	No later than May 15
OGE 278e – Termination reports	No later than 30 days after leaving a covered position (either through reassignment, resignation, or the end of acting in a covered position) (Reports may be submitted within 15 days prior to termination)
OGE 278T – Periodic transaction reports ⁵	The earlier of 30 days after learning of a transaction or 45 days of the transaction taking place.

How to request an extension of the filing deadline:

For good cause (e.g., travel, workload issues, sickness), you may request up to two 45-day extensions. Submit the request by email, including the reason, to ethics@epa.gov **prior to the due date**. Extensions cannot be granted after the due date has passed.

How to request the waiver of a late filing fee:

If *extraordinary circumstances* prevented you from meeting the deadline and OGC/Ethics assessed a late fee, you may request a waiver of the late fee. See 5 C.F.R. § 2634.704. Submit your request in writing to ethics@epa.gov, to the attention of the DAEO and ADAEO, describing the extraordinary circumstances and provide any supporting documentation. Please note that vacations or routine work obligations are not “extraordinary” circumstances. The decision to grant or deny a waiver is at the sole discretion of the DAEO/ADAEO and is final.

You are required by law to comply with these financial reporting obligations. Your colleagues in OGC/Ethics are available to provide assistance, but it is always your obligation to file your reports timely and accurately. In fact, ethics regulations *require* that we refer individuals to the Department of Justice (DOJ) when there is reasonable cause to believe that they have willfully failed to file a required report or provide the information that the report requires. The current maximum civil penalty is \$56,216.⁶

As public servants, we know that you take your ethics obligations seriously. As such, we expect you to make a good faith effort to adhere to the timeliness and completeness requirements of your financial disclosure reporting obligations. If you have any questions, please contact ethics@epa.gov.

ATTACHMENT - *When to Report Transactions on the OGE 278 and OGE 278T*

cc: Justina Fugh, Alternate Designated Agency Ethics Official

⁵ See attached guidance – *When to Report Transactions on the OGE 278 and OGE 278T*.

⁶ In 2012, OGC/Ethics referred an individual to DOJ for failure to file a termination report despite repeated reminders and entreaties. That individual paid a civil penalty of \$15,000 and still had to file the termination report.

When to Report Transactions

DUE DATE: The earlier of the following: 30 Days from Notification or 45 Days from Transaction

	Periodic Transaction Report	Annual and/or Termination Report
Investment Assets	Report on the OGE 278-T?	Report on Part 7 of the OGE 278e?
Transactions of \$1,000 or less		
• Any asset in which the transaction amount is \$1,000 or less regardless of the type of asset or who owns the asset	No	No
Your investment assets (or jointly held)		
• Your stocks	Yes	Yes
• Your bonds (except U.S. Treasury securities)	Yes	Yes
• Your commodity futures	Yes	Yes
• Your other investment securities	Yes	Yes
• Assets listed above in your (joint) brokerage accounts, (joint) managed accounts, IRAs, other retirement accounts, and/or other (joint) investment vehicles	Yes	Yes
Your spouse's investment assets		
• Spouse's stocks	Yes	Yes
• Spouse's bonds (except U.S. Treasury securities)	Yes	Yes
• Spouse's commodity futures	Yes	Yes
• Spouse's other investment securities	Yes	Yes
• Assets listed above in spouse's <u>own</u> brokerage account, managed accounts, IRAs, other retirement accounts, and/or other investment vehicles	Yes	Yes
Your dependent child's investment assets		
• Dependent child's stocks	Yes	Yes
• Dependent child's bonds (except U.S. Treasury securities)	Yes	Yes
• Dependent child's commodity futures	Yes	Yes
• Dependent child's other investment securities	Yes	Yes
• Assets listed above in dependent child's <u>own</u> brokerage account, IRAs, and/or other investment vehicles	Yes	Yes
Other investment assets irrespective of ownership		
• Real Property	No	Yes ¹
• Mutual funds, exchange traded funds, index funds and/or other "excepted investment funds" ²	No	Yes
• Any asset in which the transaction amount is \$1,000 or less	No	No
• Cash accounts (deposits and/or withdrawals)	No	No
• Money market accounts	No	No
• Money market funds	No	No
• Certificates of deposits	No	No
• US Treasury Securities (e.g., T bills, Treasury bonds, U.S. savings bonds)	No	No
• Federal Government Retirement Accounts (e.g., Thrift Savings Plan)	No	No
• Life insurance and annuities	No	No
• Collectibles	No	No
• Assets held within an excepted trust ³	No	No
• Transfer of assets between you, your spouse, and your dependent children	No	No

¹ Do not report the purchase or sale of your personal residence on Part 7 unless you rent it out at any time during the reporting period.

² To be an excepted investment fund (EIF), the asset must be:

- (a) widely held (more than 100 participants),
- (b) independently managed – arranged so that you neither exercise control nor have the ability to exercise control over the financial interests held by the fund, and
- (c) publicly traded (or available) or widely diversified.

Managed accounts, investment clubs, trusts, 529 accounts, brokerage accounts, and individual retirement accounts (IRAs) are not excepted investment funds in and of themselves. It may be that individual assets held within these types of investment vehicles may qualify as EIFs if, for example, your IRA holds a publicly-traded mutual fund. But the fact that you have a managed account does not absolve you of your reporting requirements. That account is legally owned by you, and you're responsible for its assets and reporting transactions. If you have questions, contact ethics@epa.gov.

³ OGC/Ethics must determine that your trust qualifies as an “excepted trust.” For help, email ethics@epa.gov.